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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
LOUIS DONALD MENDONSA,  
  
Defendant.

CASE NO. 2:22-CR-243-TLN

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
FINDINGS AND ORDER

DATE: February 9, 2023  
TIME: 9:30 a.m.  
COURT: Hon. Troy L. Nunley

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on February 9, 2023.
2. By this stipulation, defendant now moves to continue the status conference until April 20, 2023, at 9:30 a.m., and to exclude time between February 9, 2023, and April 20, 2023, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
  - a) The government has represented that the discovery associated with this case includes investigative reports, surveillance photographs and reports, forensic extractions of defendant's electronic devices. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying. Additionally, the government recently

1 obtained records related to defendant's prior convictions, including police reports and state court  
2 documents, which the government is redacting in order to produce in discovery.

3 b) Counsel for defendant desires additional time to review the current charges,  
4 conduct necessary investigation, to review forensic discovery, and to review additional discovery  
5 in order to prepare pretrial motions, discuss potential resolutions with his client, and otherwise  
6 prepare for trial.

7 c) Counsel for defendant believes that failure to grant the above-requested  
8 continuance would deny him/her the reasonable time necessary for effective preparation, taking  
9 into account the exercise of due diligence.

10 d) The government does not object to the continuance.

11 e) Based on the above-stated findings, the ends of justice served by continuing the  
12 case as requested outweigh the interest of the public and the defendant in a trial within the  
13 original date prescribed by the Speedy Trial Act.

14 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
15 et seq., within which trial must commence, the time period of February 9, 2023 to April 20,  
16 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code  
17 T4] because it results from a continuance granted by the Court at defendant's request on the basis  
18 of the Court's finding that the ends of justice served by taking such action outweigh the best  
19 interest of the public and the defendant in a speedy trial.

20 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
21 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
22 must commence.

23 IT IS SO STIPULATED.  
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1 Dated: February 2, 2023

PHILLIP A. TALBERT  
United States Attorney

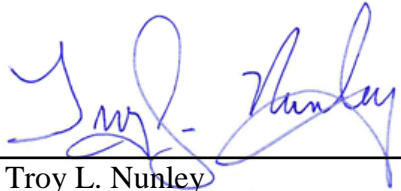
2  
3 /s/ EMILY G. SAUVAGEAU  
EMILY G. SAUVAGEAU  
Assistant United States Attorney

4  
5  
6 Dated: February 2, 2023

/s/ Doug Beevers  
Doug Beevers  
Counsel for Defendant  
Louis Donald Mendonsa

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9  
10 **ORDER**

11 IT IS SO FOUND AND ORDERED this 3<sup>rd</sup> day of February, 2023.

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16 Troy L. Nunley  
United States District Judge